

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**In re: Unique Quanetta Greene  
Debtor**

**Case No. 18-31824-KRH  
Chapter 13**

Debtor's Address: 2422 Barton Avenue, Apt. A  
Richmond, Virginia 23222

Last Four Digits of Debtor's SSN: xxx-xx-5452

**NOTICE OF MOTION TO WITHDRAW AS COUNSEL AND NOTICE OF HEARING**

Counsel for the Debtor, Unique Quanetta Greene, has filed a Motion to Withdraw as Counsel, asking that the Court permit the Boleman Law Firm, P.C., and its lawyers to withdraw as counsel of record in this Chapter 13 case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one.**

**NOTICE IS HEREBY GIVEN that a hearing thereon will be held on the above-referenced Motion at the United States Bankruptcy Court, in the Honorable Kevin R. Huennekens's Courtroom, 701 E. Broad Street, Room 5000, Richmond, VA 23219-3515, on September 19, 2018, at 11:30 a.m.**

If you want to be heard on this matter, then no later than three (3) days prior to the date of the hearing, you or your attorney must:

1. File with the court, at the address below, a written response pursuant to Local Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough so that the Court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, VA 23219

2. You must also send a copy to:

Boleman Law Firm, P.C.  
2104 Laburnum Ave., Suite 201  
P.O. Box 11588  
Richmond, VA 23230-1588

Amanda Erin DeBerry (VSB #83805)  
Boleman Law Firm, P.C.  
2104 W. Laburnum Avenue, Suite 201  
P.O. Box 11588  
Richmond, Virginia 23230-1588  
Telephone (804) 358-9900  
Counsel for Debtor

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief.

Dated: September 12, 2018

**Respectfully Submitted,**  
BOLEMAN LAW FIRM, P.C.

By: /s/ Amanda Erin DeBerry  
Amanda Erin DeBerry (VSB #83805)  
Boleman Law Firm, P.C.  
2104 W. Laburnum Avenue, Suite 201  
P.O. Box 11588  
Richmond, Virginia 23230-1588  
Telephone (804) 358-9900  
Counsel for Debtor

**CERTIFICATE OF SERVICE**

I certify that on September 12, 2018 I have transmitted a true copy of the foregoing document electronically through the Court's CM/ECF system or by mail to the Debtor, Chapter 13 trustee, the United States trustee if other than by the electronic means provided for at Local Bankruptcy Rule 2002-1, and to all creditors and parties in interest on the mailing matrix attached hereto.

By: /s/ Amanda Erin DeBerry  
Counsel for Debtor

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**MOTION TO WITHDRAW AS COUNSEL**

Boleman Law Firm, P.C., ("Boleman") hereby respectfully requests that the Court allow Boleman and each of its respective lawyers to withdraw as counsel of record for Unique Quanetta Greene (the "Debtor") based upon the following reasons:

1. Debtor filed this case on April 5, 2018.
2. Counsel has not been able to main communication with the Debtor, despite repeated attempts via phone, electronic mail, and regular first-class mail, and despite previous admonishments to Debtor of the importance of maintaining communications with counsel.
3. Counsel believes continued representation of the Debtor under the circumstances would be in violation of the Rules of Professional Conduct, i.e., Rule 1.2(c) and (d), Rule 1.3(a) and (b), Rule 1.4 (a), (b), and (c), and Rule 3.3(a).
4. Further, counsel believes Rule 1.16(a) and (b) require termination of the representation and requires that counsel seek leave to withdrawal.

WHEREFORE Boleman Law Firm, P.C., and its respective lawyers request that this Honorable Court enter an Order permitting the withdrawal as counsel of record and grant any further relief that the Court deems to be just and proper under the circumstances.

Amanda Erin DeBerry (VSB #83805)  
Boleman Law Firm, P.C.  
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P.O. Box 11588  
Richmond, Virginia 23230-1588  
Telephone (804) 358-9900  
Counsel for Debtor

**Respectfully Submitted,**

**BOLEMAN LAW FIRM, P.C.**

By: /s/ Amanda Erin DeBerry

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Boleman Law Firm, P.C.  
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By: /s/ Amanda Erin DeBerry  
Counsel for Debtor

American Credit Acceptance  
961 E. Main Street, 2nd Floor  
Spartanburg, SC 29302

Andover Place Apartments  
2852 Fairfield Ave #B  
Richmond, VA 23223

CALL Federal Credit Union  
4605 Commerce Road  
P.O. Box 26603  
Richmond, VA 23261

Check City  
Attn: Bankruptcy  
2729 W. Broad Street, Suite B  
Richmond, VA 23220

Cornerstone Acceptance  
3741 S. Nova Rd  
Port Orange, FL 32129

Genesis Properties, Inc.  
Attn: Bankruptcy Dept  
101 West Commerce Road, 2nd fl  
Richmond, VA 23224

Great Richmond Rentals  
2000 West Club Lane  
Richmond, VA 23226

Henrico Federal Credit Union  
8611 Dixon Powers Drive  
Richmond, VA 23228

John Trexlar  
2800 Buford Rd # 201  
Richmond, VA 23235

Lafayette, Ayers & Whitlock  
10160 Staples Mill Rd  
Ste 105  
Glen Allen, VA 23060

M&M Automotive  
5414 Hull Street  
Richmond, VA 23234

Peoples Advantage Credit Union  
Re: Bankruptcy  
P.O. Box 3180  
Petersburg, VA 23805-3180

Rent-A-Wreck  
8410 W Broad St  
Henrico, VA 23294

River Trace FCU  
6011 Staples Mill Rd  
Henrico, VA 23228

Westlake Financial Services  
Re: Bankruptcy  
P.O. Box 76809  
Los Angeles, CA 90076-0809

Yvonne Greene  
2422 Barton Ave., Apt. A  
Richmond, VA 23222